

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

DONALD FITZGERALD

PLAINTIFF

VS.

CIVIL NO. 1229E

DOUGLAS R. PIPER, ET AL

DEFENDANTS

* * * * *

MOTION FOR ORDER OF DEFAULT

Donald Fitzgerald, Plaintiff, by his attorneys, Lawrence E. Finegan and Rosenstock, Burgee & Welty, P.A., moves pursuant to Maryland Rule 2-613 for an Order of default against the Defendants, Douglas R. Piper and Betty M.S. Piper, and any and all unknown Defendants having any interest in the property that is the subject of this proceeding, and for reasons states:

1. On or about September 20, 1985, a copy of the Complaint to Quiet Title and/or to Reform Deed, Motion for Summary Judgment, Affidavits, Order, Order of Publication and Summonses of this Court were mailed to Defendants, Douglas Piper and Betty M.S. Piper, at Route 2, Fairfield, Pennsylvania 17320.
2. As is shown by the Affidavits of Service previously filed herein, both such individual Defendants were properly served with such documents.
3. That though more than 60 days has expired since the service of same, neither such Defendant has filed an Answer.
4. In addition, pursuant to this Court's Order of Publication, the property